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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

This Document Relates to:

Jane Doe LS 333 v. Uber Technologies, Inc., et al., No. 3:23-cv-05930-CRB

Jane Doe LS 397 v. Uber Technologies, Inc., et al., No. 3:24-cv-05864-CRB

Case No. 3:23-md-03084-CRB (LJC)

**DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL PERSONAL
IDENTIFYING INFORMATION
CONTAINED IN AN EXHIBIT TO
DEFENDANTS' MOTION TO COMPEL
COMPLIANCE WITH COURT ORDERS &
TO RESET DEADLINE FOR CERTAIN
DEPOSITIONS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 **DEFENDANTS' STATEMENT IN SUPPORT OF SEALING CONFIDENTIAL MATERIALS**

2 Under Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-
 3 CA, LLC (“Uber” or “Defendants”) hereby move this Court for an order to seal the personal identifying
 4 information (“PII”) contained in an exhibit to their Motion to Compel Compliance with Court Orders &
 5 to Reset Deadline for Certain Depositions (altogether, the “Exhibit”). The Exhibit contains PII from
 6 materials produced by both Uber and Plaintiffs. The Exhibit in question is attached as Exhibit A, filed
 7 concurrently to this Administrative Motion.

8 A party seeking to seal a judicial record bears the burden of establishing that “compelling reasons”
 9 support that request. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178–79 (9th Cir. 2006).
 10 Specifically, that party must “articulate[] compelling reasons supported by specific factual findings ...
 11 that outweigh the general history of access and the public policies favoring disclosure [of court records],
 12 such as the ‘public interest in understanding the judicial process.’” *Id.* (quoting *Foltz v. State Farm Mut.
 13 Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003)). “In turn, the [C]ourt must ‘conscientiously balance[]
 14 the competing interests’ of the public and the party who seeks to keep certain judicial records secret.” *Id.*
 15 at 1179 (quoting *Foltz*, 331 F.3d at 1135).

16 Assessment of the public and private interests implicated here warrant sealing this information.
 17 Local Rule 79-5(c)(1)(i). Uber in particular seeks to seal the names of Plaintiffs and one other individual
 18 contained throughout Exhibit, as well as home and other addresses,¹ contact information such as phone
 19 numbers and email addresses, and financial information such as credit card number. Courts have found
 20 that such information “is sealable under the compelling reasons standard.” *See, e.g., Kumandan v. Google
 21 LLC*, No. 19-cv-04286-BLF, 2022 WL 17971633, at *1 (N.D. Cal. Nov. 17, 2022). That is because such
 22 information is “not relevant to any of the issues in this litigation, nor would the public have any real
 23 interest in its disclosure.” *O’Connor v. Uber Techs., Inc.*, No. C-13-3826 EMC, 2015 WL 355496, at *3
 24 (N.D. Cal. Jan. 27, 2015). On the other hand, the public disclosure of the PII contained within the Exhibit
 25 could cause significant and avoidable harm or embarrassment to the affected individuals. Moreover, no

26
 27 ¹ Uber proposes redacting all addresses, because Uber is not able to assess which addresses are
 potentially personally identifying.

less restrictive alternative to sealing the PII in the Exhibit is sufficient. Local Rule 79-5(c)(1)(iii). Uber’s request is narrowly tailored to seal only the PII while ensuring that the public retains access to the rest of the Exhibit to the Motion to Compel. This Court may therefore “appropriately balance[]” the privacy interests of the affected individuals with the public’s right to access by allowing redaction of all such PII in the Exhibit. *O’Connor*, 2015 WL 355496, at *2.

CONCLUSION

For the foregoing reasons, Uber respectfully requests this Court grant this Administrative Motion to seal the personal identifying information, specifically the names, addresses, financial information, and contact information contained in the Exhibit to its Motion to Compel.

DATED: October 22, 2025

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Christopher V. Cotton

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